

REMARKS

In the non-final Office Action, the Examiner rejects claims 25-27, 29-32, 34-36, 38-40, and 42-46 under 35 U.S.C. § 103(a) as unpatentable over SHANKAR et al. (U.S. Patent No. 6,570,869) in view of HAKIM et al. (U.S. Patent Application Publication No. 2002/0167943).

By way of the present amendment, Applicants cancel claims 29, 34, and 43-45 without prejudice or disclaimer. Applicants further amend claims 25-27, 30-32, 35, 36, 38-40, 42, and 46 to improve form and add new claims 47-49. No new matter has been added by way of the present amendment. Claims 25-27, 30-32, 35, 36, 38, 40, 42, and 46-49 are pending. Applicants respectfully traverse the rejection under 35 U.S.C. § 103(a), with respect to the claims as currently amended.¹

Rejection under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al.

Pending claims 25-27, 30-32, 35, 36, 38, 40, 42, and 46 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over SHANKAR et al. and HAKIM et al. Applicants respectfully submit that SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination, do not disclose or suggest the combination of features recited in claims 25-27, 30-32, 35, 36, 38, 40, 42, and 46.

For example, amended independent claim 25 is directed to a method for establishing a telephone call. The method includes receiving telephone number

¹ As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such rejections (e.g., whether a reference constitutes prior art, motivation to combine references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

information that includes a telephone number and a nature of address indicator; mapping the telephone number information to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator; and establishing the telephone call based on the second nature of address indicator in the session initiation protocol message. SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, SHANKAR et al. and HAKIM et al. do not disclose or suggest mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator. The Examiner relies on Fig. 1, col. 1, lines 30-37, col. 2, lines 44-67, and col. 5, lines 15-32, of SHANKAR et al. for allegedly disclosing "converting first message format to a session initiation protocol format" and on the Abstract and paragraphs 0070, 0071, 0074, 0091, and 0093 of HAKIM et al. for allegedly disclosing "mapping of address and/or a numbering plan for establishing a call" (Office Action, p. 3). Applicants submit that these sections of SHANKAR et al. and HAKIM et al. do not disclose or suggest the above feature of claim 25.

Fig. 1 of SHANKAR et al. depicts a telecommunications network that carries voice calls from an originating node 100 to a terminating node 160 over a packet-switched network 130 (col. 3, lines 38-42). Neither this figure of SHANKAR et al. nor the description thereof discloses or suggests mapping received telephone number

information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25.

At col. 1, lines 25-37, SHANKAR et al. discloses:

Over the decades, however, major voice carriers have invested heavily in developing a Signaling System 7 (SS7) signaling and switching infrastructure to offer reliable telephone service. This infrastructure includes countless systems for billing, provisioning, maintenance, and databases that are compatible only with SS7. These systems are commonly referred to "legacy systems," a term that also includes other proprietary protocols such as ISDN_PRI, DPNSS, ISUP, TUP, NUP, H.323, and SIP. Due to the substantial investment in the legacy systems, it is desirable to keep the legacy systems in operation, yet still take advantage of the newer packet technologies.

This section of SHANKAR et al. discloses that the term "legacy systems" includes the session initiation protocol (SIP). This section of SHANKAR et al. in no way discloses or suggests mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25. In fact, this section of SHANKAR et al. in no way relates to mapping or the contents of a session initiation protocol message.

At col. 2, lines 44-67, SHANKAR et al. discloses:

More specifically, mechanisms are provided for handing the Layer 3 voice signaling of a voice call by a signaling apparatus and the Layer 2 voice traffic of the voice call by coding units. The signaling apparatus implements signaling interworking and protocol conversion, if necessary, between the legacy systems and the packet-switching network. The coding units convert bearer voice traffic between legacy and packet formats and, in some configurations, groom and backhaul the signaling information for the voice to the signaling apparatus. By separating the processing for voice signaling from handling the voice data, a flexible solution for integrating

with legacy systems is attained.

One aspect of the invention involves a telecommunications network that includes a packet-switching network, such as an IP, ATM, or frame relay network, at least two coding units coupled to the packet-switching network and to an originating node and a terminating node, respectively, and a signaling apparatus coupled to the coding units. The first of the two coding units is configured, among other things, to transmit its network address to the signaling apparatus and, in one embodiment, signaling data associated with the voice call. The second coding unit is controllable to establish a bearer channel with the first coding unit through the packet-switching network for the voice call.

This section of SHANKAR et al. discloses a signaling apparatus that implements protocol conversion between the legacy systems and the packet-switching network. This section of SHANKAR et al. further discloses a coding unit that converts bearer voice traffic between legacy and packet formats. This section of SHANKAR et al. in no way discloses or suggests mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25.

At col. 5, lines 15-32, SHANKAR et al. discloses:

The originating signaling unit 120 and the terminating signaling unit 140 implement a "virtual switch" and are responsible for processing and routing the signaling messages that are exchanged to set up and tear down a voice connection. Thus, the signaling units perform such functions as call resolution, call routing, bearer selection, and generation of call detail records (CDRs) for billing management. In one embodiment, the signaling units also convert the legacy protocols of the originating node 100 and the terminating node 160, such as DPNSS, ISDN_PRI, SS7/C7 (including ISUPs, TUPs, and NUPs), H.323, SIP, or CAS, into messages for communicating with one another and for controlling a coding unit over control links 114 and 154. Control links 114 and 154 can be implemented over IP or ATM and, in fact, on the same channel as the respective backhaul signaling link 112 and 152, respectively. Through the control

link, a coding unit is controlled by a signaling unit, for example, to establish a bearer channel for the voice data over the packet-switching network 130.

This section of SHANKAR et al. discloses that a signaling unit converts legacy protocols, such as SIP, of originating node 100 and terminating node 160 into messages for communicating with one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the conversion of legacy protocols includes mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25.

With respect to HAKIM et al., Applicants note that HAKIM et al. does not disclose or suggest a session initiation protocol format. Therefore, the Examiner cannot reasonably rely on HAKIM et al. for disclosing mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25.

Nonetheless, in the Abstract, HAKIM et al. discloses:

An Internet call connection method comprises the steps of (a) an Internet Telephony Server (ITS) receiving a dialed special services number of an originated call; (b) mapping the dialed special services number to a destination number and a Internet Protocol (IP) address of a terminating ITS that serves the destination number; and (c) routing the originated call from an originating ITS to a terminating ITS and to the destination number to complete the call. The ITS apparatus includes (1) an interface for receiving a dialed special services number over a trunk connected to the ITS; (2) accessing means for accessing a mapping database using the dialed special services number to obtain a destination number and a

terminating Internet Protocol address; and (3) a call router for routing the call and the destination number to a terminating ITS identified by the terminating Internet Protocol address.

This section of HAKIM et al. discloses the steps of an Internet call connection method.

This method of HAKIM et al. includes mapping a dialed special services number to a destination number and an IP address of a terminating ITS that serves the destination number. This section of HAKIM et al. does not disclose or suggest mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim

25. In fact, HAKIM et al. does not even mention the session initiation protocol.

At paragraph 0070, HAKIM et al. discloses:

The ITS 701 also includes an Internet Interface Card (NIC) 703, to interface to the Internet 720, and a Digital Signal Processor (DSP)-based router 704 to control connections between the PSTN interface 702 and the Internet interface 703. The Internet interface 703 enables the ITS 701 to communicate logical IP addresses over the Internet 720. The DSP-based router 704 also performs decompression/compression, decoding/coding and depacketization/packetization of signals to/from Internet 720. Enhancements include the use of the DSP-based router 704 uses of the Mapping database unit 705 to convert special services telephone numbers used by the circuit switched network 710 to and from IP addresses used by the Internet 720.

This section of HAKIM et al. discloses the use of a mapping database unit 705 to convert special services telephone numbers used by a circuit-switched network 710 to and from IP addresses used by the Internet 720. This section of HAKIM et al. does not disclose or suggest mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a

session initiation protocol message that includes a second nature of address indicator, as recited in claim 25. In fact, HAKIM et al. does not even mention the session initiation protocol.

At paragraph 0071, HAKIM et al. discloses:

The Mapping data base 705 includes database 706 which provides conversion of International and National (domestic) Toll-Free telephone numbers to a destination number needed to complete an incoming local Toll-Free number call in any country to a destination number in any another country. The database 709 provides a caller Id (e.g., caller number) to destination number conversion for applications where the special service number is mapped to several destination numbers depending on the caller's Id. The Mapping data base 705 also includes Telco/IP database 707 for destination telephone number to IP address conversions and an IP/Telco database 708 for IP address to the destination telephone number conversions. The provisioning unit 710 enables a user to update data in all of the databases of Mapping database 705.

This section of HAKIM et al. discloses a Telco/IP database 707 for destination telephone number to IP address conversions and an IP/Telco database 708 for IP address to the destination telephone number conversions. This section of HAKIM et al. does not disclose or suggest mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25. In fact, HAKIM et al. does not even mention the session initiation protocol.

At paragraph 0074, HAKIM et al. discloses:

In accordance with the present invention, U.S. National Toll-Free number services may be expanded to become an international Toll-Free service. This is done by using Mapping database 705 to provide mapping of the dialed international Toll-Free number to the destination ITS IP address and destination number. This destination ITS is the ITS serving the area at

the call destination location. The ITS routing database 705 provides a mapping from the dialed number to two distinct number fields. The first field is the termination area number labeled by country code, city code (if applicable--npa for the U.S.) and termination phone number nxx-xxxx. The second field is the IP address of the ITS that serves the destination called number. Depending on the particular design, database 705 may have to be accessed once or twice to obtain the two fields of data. The first database access may be to obtain the termination number and the second database access used to obtain the IP address based on the country code and caller Id. As previously noted, our unique assignment scheme for the Toll-Free 800/888 number service could also be used for other types of special service number calls such as 900 number or 700 number services.

This section of HAKIM et al. discloses that ITS routing database 705 provides a mapping from the dialed number to two distinct number fields -- a first field that is the termination area number labeled by country code, city code (if applicable--npa for the U.S.) and termination phone number nxx-xxxx; and a second field that is the IP address of the Internet Telephony Server (ITS) that serves the destination called number. This section of HAKIM et al. does not disclose or suggest mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25. In fact, HAKIM et al. does not even mention the session initiation protocol.

At paragraph 0091, HAKIM et al. discloses:

In step 507, the call reaches ITS 404. In step 508, the Toll-Free number is mapped, using Mapping database 509 (406 of FIG. 4), to a destination phone number as well as the IP address of ITS 407 serving the destination phone number. While the Mapping database 405 is shown as separate from ITS 404 in FIG. 4, it may be included as part of the ITS 404 as shown in FIG. 7. In a preferred embodiment, the Mapping database 705 is a separate server accessible to the various ITSs in the same manner as the 2NCP is available to existing National Toll-Free services.

This section of HAKIM et al. discloses that a toll-free number is mapped, using Mapping database 509, to a destination phone number, as well as the IP address of ITS 407 serving the destination phone number. This section of HAKIM et al. does not disclose or suggest mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25. In fact, HAKIM et al. does not even mention the session initiation protocol.

At paragraph 0093, HAKIM et al. discloses:

In step 511, the call is routed along with the destination phone number over the Internet 405 to the IP address of the ITS 407 that serves the destination phone number 410. In step 512, the destination serving ITS 407 receives the request and outpulses the call using the destination number 410 received in the request. As previously discussed, international destination number format typically includes a city code plus 5-7 digits, although sometimes no city code is required. In step 513 the call is outputted to the local switch 409 and to the destination location 410 and the connection between the caller and called party is established. In step 514, the destination ITS stores billing information, including origination, termination and call duration, to be used by associated billing systems.

This section of HAKIM et al. discloses that a call is routed, along with a destination phone number, over the Internet to an IP address of an ITS that serves the destination phone number. This section of HAKIM et al. does not disclose or suggest mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, as recited in claim 25. In fact, HAKIM et al. does not even mention the session initiation protocol.

Since SHANKAR et al. and HAKIM et al. do not disclose or suggest mapping received telephone number information (which includes a telephone number and a nature of address indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second nature of address indicator, SHANKAR et al. and HAKIM et al. cannot disclose or suggest establishing a telephone call based on the second nature of address indicator in the session initiation protocol message, as also recited in claim 25.

For at least the foregoing reasons, Applicants submit that claim 25 is patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination. Accordingly, Applicants respectfully request that the rejection of claim 25 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn.

Claims 26 and 27 depend from claim 25. Therefore, these claims are patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 25. Accordingly, Applicants respectfully request that the rejection of claims 26 and 27 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn. Moreover, these claims recite additional features not disclosed or suggested by SHANKAR et al. and HAKIM et al.

For example, claim 26 recites that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol

message to include a second numbering plan indicator. The Examiner relies on Fig. 1, col. 1, lines 30-37, col. 2, lines 44-67, and col. 5, lines 15-32, of SHANKAR et al. for allegedly disclosing converting to a session initiation protocol and on the Abstract and paragraphs 0070, 0071, 0074, 0091, and 0093 of HAKIM et al. for allegedly disclosing "mapping of address and/or a numbering plan for establishing a call" (Office Action, pp. 3-4). Applicants submit that these sections of SHANKAR et al. and HAKIM et al. do not disclose or suggest the above feature of claim 26.

Fig. 1 of SHANKAR et al. depicts a telecommunications network that carries voice calls from an originating node 100 to a terminating node 160 over a packet-switched network 130 (col. 3, lines 38-42). Neither this figure of SHANKAR et al. nor the description thereof discloses or suggests that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26.

Col. 1, lines 25-37, of SHANKAR et al. is reproduced above. This section of SHANKAR et al. discloses that the term "legacy systems" includes the session initiation protocol (SIP). This section of SHANKAR et al. in no way discloses or suggests that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26.

Col. 2, lines 44-67, of SHANKAR et al. is reproduced above. This section of SHANKAR et al. discloses a signaling apparatus that implements protocol conversion between the legacy systems and the packet-switching network. This section of SHANKAR et al. further discloses a coding unit that converts bearer voice traffic between legacy and packet formats. This section of SHANKAR et al. in no way discloses or suggests that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26.

Col. 5, lines 15-32, of SHANKAR et al. is reproduced above. This section of SHANKAR et al. discloses that a signaling unit converts legacy protocols, such as SIP, of originating node 100 and terminating node 160 into messages for communicating with one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26.

With respect to HAKIM et al., Applicants note that HAKIM et al. does not disclose or suggest a session initiation protocol format. Therefore, the Examiner cannot reasonably rely on HAKIM et al. for disclosing that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number

information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26. In fact, HAKIM et al. does not even mention the session initiation protocol.

Nonetheless, the Abstract of HAKIM et al. discloses the steps of an Internet call connection method. This method of HAKIM et al. includes mapping a dialed special services number to a destination number and an IP address of a terminating ITS that serves the destination number. This section of HAKIM et al. does not disclose or suggest that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0070 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses the use of a mapping database unit 705 to convert special services telephone numbers used by a circuit-switched network 710 to and from IP addresses used by the Internet 720. This section of HAKIM et al. does not disclose or suggest that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0071 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses a Telco/IP database 707 for destination telephone number to IP address conversions and an IP/Telco database 708 for IP address to the destination telephone number conversions. This section of HAKIM et al. does not disclose or suggest that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0074 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses that ITS routing database 705 provides a mapping from the dialed number to two distinct number fields -- a first field that is the termination area number labeled by country code, city code (if applicable--npa for the U.S.) and termination phone number nxx-xxxx; and a second field that is the IP address of the Internet Telephony Server (ITS) that serves the destination called number. This section of HAKIM et al. does not disclose or suggest that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0091 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses that a toll-free number is mapped, using Mapping database 509, to a

destination phone number, as well as the IP address of ITS 407 serving the destination phone number. This section of HAKIM et al. does not disclose or suggest that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0093 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses that a call is routed, along with a destination phone number, over the Internet to an IP address of an ITS that serves the destination phone number. This section of HAKIM et al. does not disclose or suggest that the telephone number information further includes a numbering plan indicator, and that the mapping the telephone number information to a session initiation protocol format forms the session initiation protocol message to include a second numbering plan indicator, as recited in claim 26. In fact, HAKIM et al. does not even mention the session initiation protocol.

For at least the foregoing additional reasons, Applicants submit that claim 26 is patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination. Accordingly, Applicants respectfully request that the rejection of claim 26 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn for at least these additional reasons.

Amended independent claim 30 is directed to a method for establishing a telephone call. The method includes receiving telephone number information that

includes a telephone number and a numbering plan indicator; mapping the telephone number information to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator; and establishing the telephone call based on the second numbering plan indicator in the session initiation protocol message. SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination, do not disclose or suggest this combination of features.

For example, SHANKAR et al. and HAKIM et al. do not disclose or suggest mapping the telephone number information to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator. The Examiner relies on Fig. 1, col. 1, lines 30-37, col. 2, lines 44-67, and col. 5, lines 15-32, of SHANKAR et al. for allegedly disclosing "converting first message format to a session initiation protocol format" and on the Abstract and paragraphs 0070, 0071, 0074, 0091, and 0093 of HAKIM et al. for allegedly disclosing "mapping of address and/or a numbering plan for establishing a call" (Office Action, p. 3). Applicants submit that these sections of SHANKAR et al. and HAKIM et al. do not disclose or suggest the above feature of claim 30.

Fig. 1 of SHANKAR et al. depicts a telecommunications network that carries voice calls from an originating node 100 to a terminating node 160 over a packet-switched network 130 (col. 3, lines 38-42). Neither this figure of SHANKAR et al. nor the description thereof discloses or suggests mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session

initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30.

Col. 1, lines 25-37, of SHANKAR et al. is reproduced above. This section of SHANKAR et al. discloses that the term "legacy systems" includes the session initiation protocol (SIP). This section of SHANKAR et al. in no way discloses or suggests mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30. In fact, this section of SHANKAR et al. in no way relates to mapping or the contents of a session initiation protocol message.

Col. 2, lines 44-67, of SHANKAR et al. is reproduced above. This section of SHANKAR et al. discloses a signaling apparatus that implements protocol conversion between the legacy systems and the packet-switching network. This section of SHANKAR et al. further discloses a coding unit that converts bearer voice traffic between legacy and packet formats. This section of SHANKAR et al. in no way discloses or suggests mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30.

Col. 5, lines 15-32, of SHANKAR et al. is reproduced above. This section of SHANKAR et al. discloses that a signaling unit converts legacy protocols, such as SIP, of originating node 100 and terminating node 160 into messages for communicating with

one another and for controlling a coding unit over control lines 114 and 154. This section of SHANKAR et al. in no way discloses or suggests that the conversion of legacy protocols includes mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30.

With respect to HAKIM et al., Applicants note that HAKIM et al. does not disclose or suggest a session initiation protocol format. Therefore, the Examiner cannot reasonably rely on HAKIM et al. for disclosing mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30.

Nonetheless, the Abstract of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses the steps of an Internet call connection method. The method of HAKIM et al. includes mapping a dialed special services number to a destination number and an IP address of a terminating ITS that serves the destination number. This section of HAKIM et al. does not disclose or suggest mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0070 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses the use of a mapping database unit 705 to convert special services telephone numbers used by a circuit-switched network 710 to and from IP addresses used by the Internet 720. This section of HAKIM et al. does not disclose or suggest mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0071 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses a Telco/IP database 707 for destination telephone number to IP address conversions and an IP/Telco database 708 for IP address to the destination telephone number conversions. This section of HAKIM et al. does not disclose or suggest mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0074 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses that ITS routing database 705 provides a mapping from the dialed number to two distinct number fields -- a first field that is the termination area number labeled by country code, city code (if applicable--npa for the U.S.) and termination phone number nxx-xxxx; and a second field that is the IP address of the Internet Telephony Server (ITS) that serves the destination called number. This section of HAKIM et al. does not disclose

or suggest mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0091 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses that a toll-free number is mapped, using Mapping database 509, to a destination phone number, as well as the IP address of ITS 407 serving the destination phone number. This section of HAKIM et al. does not disclose or suggest mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30. In fact, HAKIM et al. does not even mention the session initiation protocol.

Paragraph 0093 of HAKIM et al. is reproduced above. This section of HAKIM et al. discloses that a call is routed, along with a destination phone number, over the Internet to an IP address of an ITS that serves the destination phone number. This section of HAKIM et al. does not disclose or suggest mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, as recited in claim 30. In fact, HAKIM et al. does not even mention the session initiation protocol.

Since SHANKAR et al. and HAKIM et al. do not disclose or suggest mapping the telephone number information (which includes a telephone number and a numbering plan indicator) to a session initiation protocol format to form a session initiation protocol message that includes a second numbering plan indicator, SHANKAR et al. and HAKIM et al. cannot disclose or suggest establishing a telephone call based on the second numbering plan indicator in the session initiation protocol message, as also recited in claim 30.

For at least the foregoing reasons, Applicants submit that claim 30 is patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination. Accordingly, Applicants respectfully request that the rejection of claim 30 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn.

Claims 31 and 32 depend from claim 30. Therefore, these claims are patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 30. Accordingly, Applicants respectfully request that the rejection of claims 31 and 32 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn. Moreover, these claims recite additional features not disclosed or suggested by SHANKAR et al. and HAKIM et al.

For example, claim 31 recites features similar to (yet possibly of different scope than) features described above with respect to claim 26. Therefore, this claim is patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any

reasonable combination, for at least reasons similar to reasons given above with respect to claim 26. Accordingly, Applicants respectfully request that the rejection of claim 31 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn for at least this additional reason.

Independent claims 35 and 39 recite features similar to (yet possibly of different scope than) features described above with respect to claims 25 and 30. Therefore, these claims are patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination, for at least reasons similar to reasons given above with respect to claims 25 and 30. Accordingly, Applicants respectfully request that the rejection of claims 35 and 39 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn.

Claims 36 and 38 depend from claim 35. Therefore, these claims are patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 35. Accordingly, Applicants respectfully request that the rejection of claims 36 and 38 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn. Moreover, these claims are patentable over SHANKAR et al. and HAKIM et al. for reasons of their own.

For example, claim 36 recites features similar to (yet possibly of different scope than) features described above with respect to claim 26. Therefore, this claim is also patentable over SHANKAR et al. and HAKIM et al. for at least reasons similar to reasons given above with respect to claim 26. Accordingly, Applicants respectfully request that

the rejection of claim 36 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn for at least this additional reason.

Claims 40 and 42 depend from claim 39. Therefore, these claims are patentable over SHANKAR et al. and HAKIM et al., whether taken alone or in any reasonable combination, for at least the reasons given above with respect to claim 39. Accordingly, Applicants respectfully request that the rejection of claims 40 and 42 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn. Moreover, these claims are patentable over SHANKAR et al. and HAKIM et al. for reasons of their own.

For example, claim 40 recites features similar to (yet possibly of different scope than) features described above with respect to claim 25. Therefore, this claim is also patentable over SHANKAR et al. and HAKIM et al. for at least reasons similar to reasons given above with respect to claim 25. Accordingly, Applicants respectfully request that the rejection of claim 40 under 35 U.S.C. § 103(a) based on SHANKAR et al. and HAKIM et al. be reconsidered and withdrawn for at least this additional reason.

Claim 46 has been amended to depend from new claim 49. Thus, the rejection of this claim will be discussed below.

New claims

New claim 47 depends from claim 25. Therefore, this claim is patentable over the art of record for at least the reasons given above with respect to claim 25.

New claim 48 depends from claim 30. Therefore, this claim is patentable over the art of record for at least the reasons given above with respect to claim 30.

New independent claim 49 recites features similar to (yet possibly of different scope than) features described above with respect to claims 25 and 30. Therefore, Applicants submit that claim 49 is patentable over the art of record for at least reasons similar to reasons given above with respect to claims 25 and 30.

Claim 46 depends from claim 49. Therefore, this claim is patentable over the art of record for at least the reasons given above with respect to claim 49.

Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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Date: February 22, 2008

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